

PUBLIC SUBMISSION

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National Organic Program: Request for an Extension of a Currently Approved Information Collection

Comment On: AMS-NOP-13-0051-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Organic Program

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General Comment

I will limit my comments to the scope of the inspector. I work with food companies and farm-level operations alike, but for the sake of brevity, I will not comment on my experiences while functioning as a representative to the food and farm industries.

Organic Inspectors

How long does it take you to:

- Prepare and submit your report to a certifying agent following an on-site inspection?
Far longer than the onsite inspection itself. The problem is manifold:

- 1.) The certifiers seem to have populated their ranks with people who don't have a good understanding of food processing, or even farming.
- 2.) The certifier has an inherent mistrust of the inspector/evaluator, and makes requests for additional information that are outside of the certification history, or complexity of the operation. Perhaps inspectors should use a flow-chart style inspection report, with blank spaces for photographs to be pasted in at each corresponding control point in the report. That way, the representative at the certifier could be CERTAIN the inspector covered the control to the certifiers satisfaction.
- 3.) The inspector report. The reports need to be tailored to specific sectors in the food and farming industries. If a one-size-fits-all report template is used, and there are sections not filled out, the certifier makes this an issue. If a control point isn't applicable, it isn't applicable.

Furthermore, since all certifiers are now having the inspectors write reports with the NOP Auditor as the

principal audience, the amount of information expected to be in the report is often inversely correlated to the complexity of the operation. Really, who are the reports for? The NOP? Wrong! The people who founded, staff, and manage operations didn't take the market risk by "going organic" simply to suit the demands and desires of the certifier and the NOP. OF COURSE the operations need to be inspected by qualified and educated professionals. Who have relevant professional backgrounds & experience. This doesn't mean the report needs to contain detail equivalent to that of an investigative process. Each control point doesn't need to be addressed and covered as if the report writer is presenting a "white paper" on the respective topics. Enough already. The certification organizations are becoming over-populated with mere observers, rather than doers. Who appear to be on some sort of information "sugar high", just for the sake of making themselves appear "thorough" and "detail oriented". Sometimes this is needed, and many times it's burdensome and unnecessary. Let the process fit the operations being certified. It's about them. Not the certifier or the NOP.